

## **EXHIBIT 69**

### **Declaration of Chelsea Barnes**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR  
ADMISSIONS, INC.,**

**Plaintiff,**

**v.**

**UNIVERSITY OF NORTH  
CAROLINA et al.,**

**Defendants.**

**DECLARATION OF CHELSEA BARNES**

## **DECLARATION OF CHELSEA BARNES**

I, Chelsea Barnes, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

### **Background**

1. I am an American Indian (“Native”) and Caucasian woman. My mother is a citizen of the Lumbee Tribe, and my father is Caucasian. Like my mother, I am a citizen of the Lumbee Tribe.

2. I grew up in Hope Mills, North Carolina. Hope Mills is a small town near Fayetteville. It is about a 30-minute drive from my tribal community.

3. My parents divorced when I was two years old. Although my mother was my primary caregiver, I spent time with my father and his side of the family as well. Even as a young child, I was aware that the color of my skin stood out at extended-family gatherings.

4. My father received his associate’s degree when I was in middle school. My mother, who is now a speech language pathology assistant, received her bachelor’s degree when I was in high school.

5. No one in my family had attended The University of North Carolina at Chapel Hill (“UNC-CH”), but my father was a big fan of the UNC-CH basketball team. I decided at a young age that I wanted to attend college there. In high school, I worked hard to achieve that goal, even though it felt out of reach at times.

6. I attended South View High School (“South View”), a diverse school of approximately 1700 students. I estimate that less than half of my classmates were Caucasian, less than half were African-American, and a smaller number were Hispanic.

7. In addition to participating in the academically rigorous International Baccalaureate program at South View, I played two sports, was active in student government, and was inducted into the National Honor Society. I also received the Outstanding Senior Award in April 2011.

8. Although I was the valedictorian of my high school class, I did not apply to any Ivy League schools. In fact, UNC-CH was the only school to which I applied. As I look back on my senior year of high school, I remember being nervous about whether or not I would get into Carolina and if I did, what it would be like when I got there. Very few people where I was from went to college and of those that did, few went to schools like Carolina. I was ecstatic when I was offered admission through the early decision process.

9. I earned a Bachelor of Arts with Honors from UNC-CH in May 2015. I double-majored in Political Science and Communication Studies.

10. I am starting my third year at the University of North Carolina School of Law. I am a member of the Broun National Trial Team. I am president of the Student Bar Association. I have also served on the Student Attorney General's staff and as president of the Native American Law Students' Association. I anticipate that I will receive my law degree in May 2018.

### **Experience at UNC-CH**

11. As an undergraduate, I served for two years as president of Carolina Indian Circle ("CIC"), UNC-CH's undergraduate Native student group, and was recognized as CIC's Member of the Year in 2014. I also was a member of Alpha Pi Omega Sorority and Unheard Voices A Capella Group, served as a Student Ambassador for the UNC-CH American Indian Center, and

participated in the Cultural Competence Leadership Institute. I served as a Resident Advisor for two years, earning the Hayden B. Renwick Award for Academic Excellence twice.

12. My freshman year at UNC-CH was not what I had expected. I struggled a little bit and was not very focused. I thought I wanted to be a nurse, but my science classes were less enjoyable than I had anticipated. My first-semester grade point average was a disappointing 2.67.

13. Becoming involved with the American Indian Center (“AI Center”) was a turning point for me. The AI Center was the first organization on campus to reach out to me, and the first person I became friends with at UNC was Native and Black. Even so, I was unsure at first whether I would feel at home at AI Center events. I had not grown up in a tribal community, and despite the racial diversity at South View High School, I had been one of just two American Indian students there. Before long, however, I realized that having a different perspective was a good thing.

14. In the spring of my sophomore year, I joined the Native American interest sorority. It was not a traditional social sorority. It was much smaller – just five or six members – and the recruitment process was very different, with lots of study halls and other low-key activities to get to know the other members. The semester I joined the sorority was the first semester that I made the Dean’s List, and my grades continued to improve. I seemed to be encountering fewer distractions, and I felt supported by everyone I was with. Once I experienced that feeling of support, UNC-CH became my home away from home.

15. The support of my sorority sisters was a catalyst for many other positive experiences at UNC-CH. I picked up a lot of good leadership experiences both within the sorority and beyond. As an example, my sisters encouraged me to become president of the

Carolina Indian Circle (“CIC”). I never would have fathomed I could do that. Some in the CIC were very engaged in their tribal communities, and I was not sure how they would evaluate me because I was less connected to mine. When I realized that my unique perspective could be an asset, however, I stepped out of my comfort zone and into that leadership role.

16. My junior year, I was a scholar with the Cultural Competence Leadership Institute (“CCLI”), a leadership development program. While UNC-CH is by no means perfect and has a long way to go (along with the rest of the world), UNC-CH made many efforts to be inclusive and I was proud to be part of these efforts. As a CCLI scholar, I was able to be a part of the small community of people who took the time to attempt to work and mediate the issues that still exist. Cultural competency is something that is perhaps taken for granted or even ignored in many contexts, and the CCLI program helped to educate myself and others about cultural competency and helped us to develop the skills needed to promote a diverse, yet inclusive, environment.

17. I wrote my senior thesis about the process of obtaining federal recognition for the Lumbee tribe. It was an opportunity to apply the skills and knowledge I was learning at UNC-CH to an issue impacting the Lumbee tribe.

18. As a senior, I was honored to receive the Irene F. Lee Award from Chancellor Folt. The Lee Award is given each year to the woman in the senior class judged most outstanding in leadership, character, and scholarship.

19. Though I worked hard to earn these opportunities, I wouldn’t have gotten there without the support system I established within the Native community at Carolina.

20. As a UNC-CH student, at times I was the only non-white person in the room. It would be easy to silo yourself and to not interact much with students of other backgrounds. That

said, there are many opportunities for interaction for those who were interested in reaching out. I never felt isolated because I became involved in campus activities so early.

21. Diversity played an important role in the educational experience I had at UNC-CH. In the classroom, I heard good and bad things about Native American culture. Fortunately, this provided opportunities to educate others. If there is no one in the room from a particular background, statements and assumptions about people from those backgrounds may be inaccurate and go unchallenged.

22. The diversity on campus and the importance of that diversity was especially apparent to me in my work as a Resident Advisor (“RA”). As an RA, you serve as the first point of contact for students experiencing challenges. In helping them to solve problems, it was especially important to understand residents’ cultural perspectives. Furthermore, a residence hall is supposed to serve as a student’s home away from home. That means it is important that residents respect and understand each other so that everyone can feel comfortable being himself or herself in that space. I believe that the presence of a diverse group of RAs helps many students feel more comfortable.

### **Conclusion**

23. Having other students of color, and native students specifically, to support me made a big difference in how comfortable I was on campus and how willing I was to put myself out there and meet new people. Having students from different backgrounds and having other students who shared aspects of my race and ethnicity helped me to learn and thrive at UNC. I believe that having many students of color from different backgrounds on campus is very important to the learning environment and to minority students.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 08/21/17

Chelsea Barnes  
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